

Todd L. Bice, Esq., Bar No. 4534

TLB@pisanellibice.com

Duston H. Holmes, Esq., Bar No. 12776

DHH@pisanellibice.com

Robert A. Ryan, Esq., Bar No. 12084

RR@pisanellibice.com

PISANELLI BICE PLLC

400 South 7th Street, Suite 300

Las Vegas, Nevada 89101

Telephone: 702.214.2100

Facsimile: 702.214.2100

*Attorneys for Pioneer Hotel, Inc.,
Mandalay Resort Group, MGM Resorts International,
MSE Investments, Inc., Gold Strike Investments, Inc.,
Newcastle Corp., and Ramparts, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SIERRA DEVELOPMENT CO. d/b/a CLUB
CAL NEVA,

Plaintiff,

v.

CHARTWELL ADVISORY GROUP, LTD.

Defendant.

CASE NO. 3:13-cv-00602-RTB-VPC

**STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION TO FILE
MOTION FOR ATTORNEYS' FEES AND
COSTS AND TO SUBMIT BILL OF
COSTS**

(FOURTH REQUEST)

CHARTWELL ADVISORY GROUP, LTD.,

Counterclaim Plaintiff,

v.

SIERRA DEVELOPMENT CO., *et al.*,

Counterclaim Defendants.

Defendant/Counterclaimant Chartwell Advisory Group, LTD. ("Chartwell"), Counterclaim Defendant Pioneer Hotel, Inc. ("Pioneer"); Counterclaim Defendants Mandalay Resort Group, MGM Resorts International, MSE Investments, Inc., Gold Strike Investments, Inc., Newcastle Corp. and Ramparts, Inc. (collectively, the "Mandalay Parties"); Counterclaim Defendants Harrah's Las Vegas, LLC, Harrah's Laughlin, LLC and Rio Properties, LLC (collectively, the "Harrah's Parties" and together with Pioneer and the Mandalay Parties as

1 "Counterclaim Defendants"), by and through their respective counsel, hereby stipulate and agree as
2 Follows:

3 1. On July 6, 2018, this Court entered its Memorandum Decision following the Bench
4 Trial in this case. [ECF No. 689]

5 2. That same day, the clerk of the Court entered Judgment in accordance with this
6 Court's Memorandum Decision. [ECF No. 690]

7 3. Based on these dates, any motions for attorneys' fees and costs pursuant to
8 Fed. R. Civ. P. 54(d) and/or requests for taxable costs under Local Rule 54-1 would have been due
9 within fourteen (14) days, or by **July 20, 2018**.

10 4. On July 19, 2018, the Parties filed a Stipulation and Proposed Order to extend the
11 July 20, 2018 deadline to August 3, 2018 so the Parties could explore the possibility of resolution
12 [ECF No. 691].

13 5. The Court granted this Stipulation on July 27, 2018. [ECF No. 695]

14 6. On August 1, 2018, the parties sought an additional two week extension of the
15 August 3, 2018 date as negotiations were ongoing. [ECF No. 692]

16 7. Again, on August 15, 2018, the parties sought another two week extension to August
17 31, 2018. [ECF No. 698]

18 8. The Parties continue to explore the possibility of resolution and seek one final
19 extension to see if a full resolution is workable.

20 9. As such, the parties request an additional two-week extension of time to file any
21 motions for attorneys' fees and costs under Fed. R. Civ. P. 54(d) and/or any requests for taxable
22 costs under Local Rule 54-1, such that all such motions and requests would be due on or before
23 **September 14, 2018**.

10. The Parties request this extension in good faith and not for any dilatory motive.

DATED this 30th day of August, 2018.

PISANELLI BICE PLLC

DILWORTH PAXSON LLP

By: /s/ Todd L. Bice
Todd L. Bice, Esq., Bar No. 4534
Dustun H. Holmes, Esq., Bar No. 12776
Robert A. Ryan, Esq., Bar No. 12084
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101

By: /s/ Joshua D. Wolson
Joshua D. Wolson, Esq. (*pro hac vice*)
1500 Market Street, Suite 3500E
Philadelphia, PA 19102

Calvin R.X. Dunlap, Esq., Bar No. 2111
Monique Laxalt, Esq., Bar No. 1969
DUNLAP & LAXALT
537 Ralston Street
Reno, Nevada 89503

*Attorneys for Counterclaim Defendants
Mandalay Resort Group, MGM Resorts
International, MSE Investments, Inc., Gold
Strike Investments, Inc., Newcastle Corp., and
Ramparts, Inc.*

Attorneys for Chartwell Advisory Group, Ltd.

DICKINSON WRIGHT PLLC

By: /s/ Michael N. Feder
Michael N. Feder, Esq., Bar No. 7332
Joel Z. Schwarz, Esq., Bar No. 9181
8363 West Sunset Road, Suite 200
Las Vegas, Nevada 89113

*Attorneys for Caesars Entertainment
Corporation, Harrah's Las Vegas, LLC,
Harrah's Laughlin, LLC, Rio Properties, LLC,
Golden Nugget, Inc., GNLV Corp., and Golden
Nugget Hotels and Casinos*

ORDER

Based upon the Stipulation of the Parties, and good cause appearing therefore, IT IS
HEREBY ORDERED:

The Deadline for the Parties to submit any motions for attorneys' fees and costs pursuant to
Fed. R. Civ. P. 54(d) and/or any requests for costs pursuant to Local Rule 54-1 shall be extended to
September 14, 2018.

IT IS SO ORDERED.


U.S. DISTRICT COURT JUDGE

DATED: 9/4/18